



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

December 13, 2021

**VIA ECF**

**MEMO ENDORSED**

Elise M. Bloom  
Member of the Firm  
d +1.212.969.3410  
f 212.969.2900  
ebloom@proskauer.com  
www.proskauer.com

Hon. Laura Taylor Swain  
U.S. District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 17C  
New York, New York 10007-1312

Re: *Wood et al. v. Mike Bloomberg 2020, Inc.* (20 Civ. 2489) (LTS) (GWG)

Dear Judge Swain:

We represent Defendant Mike Bloomberg 2020, Inc. (the “Campaign”) in the above-referenced matter. Pursuant to Your Honor’s Individual Rule of Practice 1.e, we write to respectfully request a two-day extension of time, through December 16, 2021, for the Campaign to file its opposition to Plaintiffs’ Motion for Equitable Tolling (Dkt. Nos. 200-201). The Campaign makes this request for a short extension of time in light of the Order issued by Magistrate Judge Gorenstein on December 10, 2021, which encouraged the parties to confer as to whether it would be possible to stipulate to an agreed-upon resolution of Plaintiffs’ Motion for Equitable Tolling (Dkt. Nos. 200-201) and the parties’ letter regarding other disputes pertaining to notice (Dkt. No. 205). Plaintiffs consent to this instant request for an extension.

The Campaign’s opposition is currently due on December 14, 2021. The Campaign previously requested a one-week extension of time to oppose Plaintiffs’ Motion for Equitable Tolling in light of the Thanksgiving holiday, and that request was granted. (Dkt. Nos. 202 & 204.)

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

The foregoing request for an extension is granted. Dkt no. 207 resolved. SO ORDERED.

12/13/2021

/s/ Laura Taylor Swain, USDJ

cc: All Counsel (via ECF)